

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

19-CR-1631 DHU

KAMAL BHULA,

Defendant.

**DEFENDANT KAMAL BHULA'S MOTION FOR WITHDRAWAL OF COUNSEL
KARI MORRISSEY AND APPOINTMENT OF ATTORNEY SARAH GORMAN AS
SECOND COUNSEL**

Defendant Kamal Bhula, through his undersigned counsel, Nicole W. Moss respectfully submits this Motion for Withdrawal of Counsel Kari Morrissey and Appointment of Attorney Sarah Gorman as Second Counsel. In support of this Motion, Defendant states:

1. Defendant Bhula is charged pursuant to a superseding indictment with one count of Conspiracy in violation of 18 U.S.C. § 1594(c), three counts of Sex Trafficking by Means of Force, Threats, Fraud, and Coercion in violation of 18 U.S.C. § 1591(a)(1) and (b)(1), one count of Benefitting Financially from a Sex Trafficking Venture in violation of 18 U.S.C. § 1591(a)(2) and (b)(1), one count of Interstate and Foreign Travel and Transportation in Aid of Racketeering Enterprises in violation of 18 U.S.C. § 1952(a)(3)(A), one count of Conspiracy in violation of 21 U.S.C. § 846, one count of Maintaining a Drug-Involved Premises in violation of 21 U.S.C. § 856(a), one count of Maintaining a Drug-Involved Premises Within 1,000 Feet of a School in violation of 18 U.S.C. § 860(a), and one count of Conspiracy in violation of 18 U.S.C. § 1956(h). *See* Doc. 68.

2. On July 29, 2019 the Court entered an Order declaring this matter to be complex pursuant to 18 U.S.C. § 3161(h)(7)(b)(ii). *See* Doc. 49.
3. Mr. Bhula is currently in custody of the United States Marshals in Milan, NM and is awaiting trial.
4. This Court has set a Call of the Calendar for July 27, 2023, with trial and jury selection currently set to begin on August 7, 2023.
5. The Court previously appointed CJA panel attorney Kari T. Morrissey as second counsel when Ms. Morrissey and Ms. Moss were law partners working in the same office. Ms. Morrissey left the Law Office of Nicole W. Moss in November 2022 and no longer works with Ms. Moss.
6. Defendant requests that the Court permit the withdrawal of CJA panel attorney Kari T. Morrissey and appoint CJA panel attorney Sarah Gorman as second counsel. Ms. Gorman has agreed to serve as second counsel in this case and is sufficiently qualified to assist the undersigned counsel in representing Mr. Bhula. She has experience litigating complex criminal and civil cases in federal court. Ms. Gorman serves on the CJA panel and previously worked as a Federal Public Defender in San Diego, California, representing hundreds of client before returning to New Mexico. *See Resume of Sarah M. Gorman* attached as Exhibit A.
7. Ms. Gorman will be able to assist Ms. Moss in an efficient and competent manner. Under the circumstances, these attorneys will be able to avoid duplication of effort. Mr. Bhula approves of the involvement of Ms. Gorman in the defense of her case.
8. Attorney Christopher Lancaster, CJA Resource Counsel, has no objection to the relief sought in this motion.

9. Attorney Sarah Gorman approves of the relief sought in this motion.
10. Assistant United States Attorney Letitia Simms was contacted and does not oppose the relief sought in this motion.
11. Undersigned counsel emailed Attorney Kari T. Morrissey for her position to this motion but received no response.

WHEREFORE, Defendant Kamal Bhula respectfully requests that the Court allow the withdrawal of Kari Morrissey and appoint local CJA attorney Sarah Gorman as second counsel in the above-referenced matter.

Respectfully submitted,

/s/ Nicole W. Moss
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CERTIFICATE OF FILING

I hereby certify that this pleading was filed on the CM/ECF system on this 11th day of May 2023 and is thus viewable by the Court and by the filing party.

/s/ Nicole W. Moss
Nicole W. Moss